

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

RONALD STAFFORD

PLAINTIFF

V.

CIVIL ACTION NO.: 1:15-cv-414-HSO-JCG

MALORIE HUDSON-KLINE ORY,  
GOVERNMENT EMPLOYEES INSURANCE COMPANY,  
GEICO INSURANCE AGENCY, INC.  
LAMORAK INSURANCE COMPANY f/k/a  
ONE BEACON AMERICA INSURANCE COMPANY,  
ATLANTIC SPECIALTY INSURANCE COMPANY d/b/a  
ONE BEACON AMERICA INSURANCE,  
OBI NATIONAL INSURANCE COMPANY d/b/a  
ONE BEACON AMERICA INSURANCE AND  
UNKNOWN INSURANCE COMPANIES 1-5

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Comes now Jessica S. Malone and files this Motion to Withdraw as Counsel of Record for Defendant, Lamorak Insurance Company f/k/a/ One Beacon America Insurance Company, and, in support of the same, would show unto the Court as follows:

1. Undersigned counsel, in her capacity as an associate attorney for Allen, Allen, Breeland & Allen, PLLC, entered an appearance on behalf of Defendant.
2. Undersigned counsel is leaving the firm and relocating to another state which necessitates that she withdraw from the instant cause of action.
3. The Defendant will continue to be represented by Allen, Allen, Breeland & Allen, PLLC.
4. No prejudice will occur to any of the parties if this motion is granted.

WHEREFORE PREMISES CONSIDERED, Jessica S. Malone respectfully requests that this Court enter an order allowing her to withdraw as counsel of record for Defendant.

**DATE: May 11, 2018.**

Respectfully submitted,

**LAMORAK INSURANCE COMPANY  
f/k/a ONE BEACON AMERICA  
INSURANCE COMPANY**

By: /s/ Jessica S. Malone  
One of Their Attorneys

WILLIAM R. ALLEN (MSB No. 100541)  
J. CHADWICK WILLIAMS (MSB #102158)  
JESSICA S. MALONE (MSB No. 102826)  
Allen, Allen, Breeland & Allen, PLLC  
P. O. Box 751  
Brookhaven, MS 39602-0751  
Tel. 601-833-4361  
Fax 601-833-6647  
[wallen@aabalegal.com](mailto:wallen@aabalegal.com)  
[cwilliams@aabalegal.com](mailto:cwilliams@aabalegal.com)  
[jmalone@aabalegal.com](mailto:jmalone@aabalegal.com)

**CERTIFICATE**

I, the undersigned of Allen, Allen, Breeland & Allen, PLLC, hereby certify that on this day, I electronically filed the foregoing Motion to Withdraw as Counsel with the Clerk of the Court using the ECF system which gave notice to the following:

Collin Maley, Esq.  
MALEY & WALKER, PLLC  
P.O. Box 12827  
Jackson, Mississippi 39236  
[cmaley@maleywalker.com](mailto:cmaley@maleywalker.com)  
*Attorney for Plaintiff*

MaryAnna Penton Holley  
Ronnie Glen Penton  
The Penton Law Firm  
5760 Interstate 55 North, Ste 150  
Jackson, Mississippi 39211  
[maryanna@thepentonlawfirm.com](mailto:maryanna@thepentonlawfirm.com)  
*Attorney for Plaintiff*

Victor A. DeBose, Esq.  
Law Office of Victor A. DuBose  
1290 Main Street, Suite A  
Daphne, AL 36526  
Mobile, AL 36609  
[vdubose@geico.com](mailto:vdubose@geico.com)  
*Attorney for Defendant, GEICO*

This the 11<sup>th</sup> day of May, 2018.

/s/ Jessica S. Malone  
OF COUNSEL